

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMANI M. ABBASI,

Plaintiff,

v.

RITZ CAMERA CENTERS, INC.,

Defendant.

Case No.08 C 506

Hon. Judge Der-Yeghiayan

Magistrate Judge Ashman

JOINT INITIAL STATUS REPORT

Plaintiff Amani Abbasi (“Plaintiff”), by and through her attorney, and Defendant Ritz Camera Centers, Inc. (“Defendant”), by its attorneys, met and conferred on March 5, 2008, pursuant to the requirements of Federal Rule of Civil Procedure 26(f), and file this Joint Initial Status Report in compliance with this Court’s standing order.

1. Nature of Claims and Counterclaims

Plaintiff seeks redress for alleged religion, national origin, and ancestry discrimination and retaliation by Defendant pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000 *et seq.* (“Title VII”). No counterclaims are currently pending in this action.

2. Relief Sought by Plaintiff

Plaintiff seeks compensatory damages, punitive damages, and reasonable attorney’s fees.

3. Names of Parties Not Served

Defendant has accepted service of process and its answer to Plaintiff’s complaint is due to be filed with the Court on March 31, 2008.

4. Principal Legal Issues

- A. Whether Defendant discriminated against Plaintiff on the basis of her religion, national origin or ancestry in violation of Title VII.
- B. Whether Defendant failed to prevent or correct discrimination against Plaintiff on the basis of her religion, national origin or ancestry in violation of Title VII.
- C. Whether Defendant retaliated against Plaintiff for complaints of discrimination on the basis of her religion, national origin or ancestry in violation of Title VII.
- D. Whether Plaintiff has exhausted her administrative remedies relative to all of her articulated claims.

5. Principal Factual Issues

The principal factual issue is the nature of the alleged discrimination and retaliation.

6. List of Pending Motions

No motions are currently pending.

7. Description of Discovery Requested and Exchanged

No discovery has been requested or exchanged.

8. Type of Discovery Needed

The parties will need to exchange interrogatories, production requests, and requests for admission. The parties will also need to take depositions. The parties do not anticipate the need for expert witnesses at this time.

9. Suggested Discovery Dates

- A. Rule 26(a)(1) Disclosures by April 15, 2008
- B. Fact and Discovery Completion by January 30, 2009

C. Dispositive Motions to be filed by March 13, 2009

D. Final Pretrial Order to be filed within 120 days after ruling on all dispositive motions.

10. Ready for Trial

The parties estimate the case will be ready for trial 90 days after rulings on all dispositive motions.

11. Trial Length

The parties estimate that a four day trial will be necessary.

12. Jury Trial

Plaintiff has requested a jury trial.

13. Settlement Discussions

The parties have not engaged in settlement discussions.

14. Consent to Magistrate

The parties do not consent to proceeding before the Magistrate Judge.

AMANI ABBASI

RITZ CAMERA CENTERS, INC.

s/ Patricia Kemling
One of Her Attorneys

s/ Jane M. McFetridge
One of Its Attorneys

Patricia Kemling
Council on American – Islamic Relations
28 E. Jackson Blvd, Suite 1410
Chicago, IL 60604
312.212.1520

Jane M. McFetridge
Carmen B. Copher
Jackson Lewis LLP
320 West Ohio Street, Suite 500
Chicago, IL 60610
312.787.4949

Dated: March 14, 2008

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on March 14, 2008, she caused a true and correct copy of the foregoing Joint Initial Status Report to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys of record registered with the Court's ECF/CM system, including:

Patricia Kemling
Council on American – Islamic Relations
28 E. Jackson Blvd, Suite 1410
Chicago, IL 60604
312.212.1520

By: /s/ Jane M. McFetridge